



Louisville Metro Air Pollution Control District
850 Barret Avenue
Louisville, Kentucky 40204-1745



Federally Enforceable District Origin Operating Permit (FEDOOP)

Permit No.: 125-01-F(R2)

Plant ID: 0221

Effective Date: [Click here to enter a date.](#)

Expiration Date: [Click here to enter a date.](#)

Permission is hereby given by the Louisville Metro Air Pollution Control District to operate the process(es) and equipment described herein which are located at:

Brenntag Mid-South, Inc.
3900 Tucker Ave.
Louisville, KY 40216

The applicable procedures of District Regulation 2.17 regarding review by the U.S. EPA and public participation have been followed in the issuance of this permit. Based on review of the application on file with the District, permission is given to operate under the conditions stipulated herein. If a renewal permit is not issued prior to the expiration date, the owner or operator may continue to operate in accordance with the terms and conditions of this permit beyond the expiration date, provided that a complete renewal application is submitted to the District no earlier than twelve (12) months and no later than ninety (90) days prior to the expiration date.

Emission limitations to qualify for non-major status:

Pollutant:	VOC	Single HAP	Total HAP
Tons/year:	25	5	12.5

Application No.: 38189

Application Received: 4/16/2012

Permit Writer: Karen Thorne

Public Notice Date: 10/11/2014

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Air Pollution Control Officer
{date1}

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Permit Revisions/Changes

Revision No.	Issue Date	Type	Page No.	Description
2	Xx/xx/14	Renewal	Entire permit	Permit Renewal
1	06/30/07	Renewal	Entire permit	Permit Renewal
NA	11/05/01	Initial	Entire permit	Initial issuance

Acronyms and Abbreviations

AP-42	- AP-42, <i>Compilation of Air Pollutant Emission Factors</i> , published by U.S.EPA
APCD	- Louisville Metro Air Pollution Control District
BAC	- Benchmark Ambient Concentration
Btu	- British thermal unit
CEMS	- Continuous Emission Monitoring System
CFR	- Code of Federal Regulations
CO	- Carbon monoxide
District	- Louisville Metro Air Pollution Control District
EA	- Environmental Acceptability
gal	- U.S. fluid gallons
GHG	- Greenhouse Gas
HAP	- Hazardous Air Pollutant
HCl	- Hydrogen chloride
Hg	- Mercury
hr	- Hour
in.	- Inches
lbs	- Pounds
l	- Liter
LMAPCD	- Louisville Metro Air Pollution Control District
mmHg	- Millimeters of mercury column height
MM	- Million
NAICS	- North American Industry Classification System
NO _x	- Nitrogen oxides
PM	- Particulate Matter
PM ₁₀	- Particulate Matter less than 10 microns
PM _{2.5}	- Particulate Matter less than 2.5 microns
ppm	- parts per million
PSD	- Prevention of Significant Deterioration
psia	- Pounds per square inch absolute
QA	- Quality Assurance
SIC	- Standard Industrial Classification
SIP	- State Implementation Plan
SO ₂	- Sulfur dioxide
STAR	- Strategic Toxic Air Reduction
TAC	- Toxic Air Contaminant
UTM	- Universal Transverse Mercator
VOC	- Volatile Organic Compound
w.c.	- Water column
year	- Any period of twelve consecutive months, unless "calendar year" is specified
yr	- Year, or any 12 consecutive-month period, as determined by context

Preamble

This permit covers only the provisions of Kentucky Revised Statutes Chapter 77 Air Pollution Control, the regulations of the Louisville Metro Air Pollution Control District (District) and, where appropriate, certain federal regulations. The issuance of this permit does not exempt any owner or operator to whom it has been issued from prosecution on account of the emission or issuance of any air contaminant caused or permitted by such owner or operator in violation of any of the provisions of KRS 77 or District regulations. Any permit shall be considered invalid if timely payment of annual fees is not made. The permit contains general permit conditions and specific permit conditions. General conditions are applicable unless a more stringent requirement is specified elsewhere in the permit.

General Conditions

1. The owner or operator shall comply with all General Conditions herein and all terms and conditions in the referenced process/process equipment list.
2. All terms and conditions in this FEDOOP are enforceable by EPA, except those terms and conditions specified as District-only enforceable, and those which are not required pursuant to the Clean Air Act Amendments of 1990 (CAAA) or any of the Act's applicable requirements.
3. All application forms, reports, compliance certifications, and other relevant information submitted to the District shall be certified by a responsible official. If a change in the responsible official (RO) occurs during the term of this permit, or if an RO is added, the owner or operator shall provide written notification (Form AP-100A) to the District within 30 calendar days of such change or addition.
4. The owner or operator shall submit an annual compliance certification, signed by the responsible official, to the District, on or before April 15 of the year following the year for which the certification applies. This certification shall include completion of District Form 9440-0.
5. Periodic testing, instrumental monitoring, or non-instrumental monitoring, which may include record keeping, shall be performed to the extent necessary to yield reliable data for purposes of demonstrating continuing compliance with the terms and conditions of this permit.
6. The owner or operator shall retain all records required by the District or any applicable requirement, including all required monitoring data and supporting information, for a period of five years from the date of the monitoring, sampling, measurement, report, or application, unless a longer time period for record retention is required by the District or an applicable requirement. Records shall be retrievable within a reasonable time and made available to the District, Kentucky Division for Air Quality, or the EPA upon request.
7. The owner or operator shall provide written notification to the District, and receive approval, prior to making any changes to existing equipment or processes that would result in emissions of any regulated pollutant in excess of the allowable emissions specified in this permit.
8. This permit may be reissued, revised, reopened, or revoked pursuant to District Regulation 2.17. Repeated violations of permit conditions are sufficient cause for revocation of this permit. The filing of a request by the owner or operator for any reissuance, revision, revocation, termination, or a notification of planned changes in equipment or processes, or anticipated noncompliance shall not alter any permit requirement.
9. Except as otherwise specified or limited herein, the owner or operator shall not allow or cause the emissions to equal or exceed either 10 tons per year, or such lesser quantity as the EPA has established by rule, of any one Hazardous Air Pollutant (HAP) or 25 tons per year of all HAPs combined. Fugitive HAP emissions shall be included in this limit. HAPs are listed in Section 112(b) of the CAAA and as amended in 40 CFR 63, Subpart C.
10. Except as otherwise specified or limited herein, the owner or operator shall not allow or cause the emissions to equal or exceed 100 tons per year of any regulated pollutant, including particulate matter, PM₁₀, PM_{2.5}, sulfur dioxide, carbon monoxide, nitrogen oxides, lead, hydrogen sulfide, gaseous fluorides, total fluorides, or Volatile Organic Compounds (VOC); any pollutant subject to any standard in District Regulation 7.02; any substance listed in sections 112(r), 602(a) and 602(b) of the CAAA; or any combination of greenhouse gasses whose combined global warming potential equals or exceeds 100,000 tons CO₂-equivalent, as defined in 40 CFR 98 (except that prior to July 21, 2014, the mass of the greenhouse gas carbon dioxide shall not include biogenic carbon dioxide emissions defined in 40 CFR 52.21(b)(49)(ii)(a)). Fugitive emissions shall be included in these limits for source categories listed in District Regulation 2.16.

11. Unless specified elsewhere in this permit, the owner or operator shall complete required monthly record keeping within 30 days following the end of each calendar month.
12. Unless specified elsewhere in this permit, the owner or operator shall submit annual reports demonstrating compliance with the emission limitations specified. The report shall contain monthly and consecutive 12-month totals for each pollutant that has a federally enforceable limitation on the potential to emit. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement or a declaration that there were no such deviations. All annual compliance reports shall include the statement "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete" and the signature and title of a responsible official of the company. The report must be postmarked no later than March 1 of the year following the calendar year covered in the annual report.
13. The owner or operator shall comply with all applicable requirements of the following federally enforceable District Regulations:

Regulation	Title
1.01	General Application of Regulations and Standards
1.02	Definitions
1.03	Abbreviations and Acronyms
1.04	Performance Tests
1.05	Compliance with Emissions Standards and Maintenance Requirements
1.06	Source Self-Monitoring, Emissions Inventory Development and Reporting
1.07	Excess Emissions During Startups, Shutdowns, and Upset Conditions
1.08	Administrative Procedures
1.09	Prohibition of Air Pollution
1.10	Circumvention
1.11	Control of Open Burning
1.14	Control of Fugitive Particulate Emissions
2.01	General Application (Permit Requirements)
2.02	Air Pollution Regulation Requirements and Exemptions
2.03	Authorization to Construct or Operate; Demolition/Renovation Notices and Permit Requirements
2.07	Public Notification for Title V, PSD, and Offset Permits; SIP Revisions; and Use of Emission Reduction Credits
2.09	Causes for Permit Modification, Revocation, or Suspension
2.10	Stack Height Considerations
2.11	Air Quality Model Usage
2.17	Federally Enforceable District Origin Operating Permits
4.01	General Provisions for Emergency Episodes
4.02	Episode Criteria
4.03	General Abatement Requirements
4.07	Episode Reporting Requirements
6.01	General Provisions
6.02	Emission Monitoring for Existing Sources
7.01	General Provisions

14. The owner or operator shall comply with all applicable requirements of the following District-only enforceable regulations:

Regulation	Title
1.12	Control of Nuisances

1.13	Control of Objectionable Odors in the Ambient Air
2.08	Fees
5.00	Definitions
5.01	General Provisions
5.02	Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants
5.14	Hazardous Air Pollutants and Source Categories
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant
5.21	Environmental Acceptability for Toxic Air Contaminants
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant
5.23	Categories of Toxic Air Contaminants
7.02	Adoption of Federal New Source Performance Standards

15. The owner or operator shall submit emission inventory reports, as required by Regulation 1.06, if so notified by the District.
16. The owner or operator shall submit timely reports of abnormal conditions or operational changes that may cause excess emissions, as required by Regulation 1.07.
17. Applications, reports, test data, monitoring data, compliance certifications, and any other document required by this permit shall be submitted to:

***Air Pollution Control District
Room 205
850 Barret Ave
Louisville, KY 40204-1745***

Emission Unit U1**U1:** Solvent storage tanks**U1 Applicable Regulations**

Regulation	Title	Applicable Sections
5.15	Chemical Accident Prevention Provisions	1
<u>7.12</u>	Standards of Performance for New Storage Vessels for Volatile Organic Compounds	1, 2, 3.3, 5, 7 and 8

U1 Emission Points

EP ID	Description	Maximum Capacity	Construction Date	Applicable Regulation	Control Device	Stack ID
E-1	Fixed-roof w/ N2 Pad, Isopropyl Alcohol	6500 gal	1996	7.12	NA	S-1
E-2	Fixed-roof w/ N2 Pad, Mineral Spirits	6500 gal	1996	7.12	NA	S-2
E-3	Fixed-roof w/ N2 Pad, N-butyl acetate	6500 gal	1996	7.12	NA	S-3
E-4	Fixed-roof w/ N2 Pad, Methyl amyl ketone	6500 gal	1996	7.12	NA	S-4
E-5	Fixed-roof w/ N2 Pad, Acetone	6500 gal	1996	7.12	NA	S-5
E-6	Fixed-roof w/ N2 Pad, VM&P naphtha	5000 gal	1996	7.12	NA	S-6
E-7	Fixed-roof w/ N2 Pad, N-propyl alcohol	5000 gal	1996	7.12	NA	S-7
E-8	Fixed-roof w/ N2 Pad, Toluene	5000 gal	1996	7.12	NA	S-8
E-9	Fixed-roof w/ N2 Pad, Mineral Spirits	5000 gal	1996	7.12	NA	S-9
E-10	Fixed-roof w/ N2 Pad, Mineral Spirits	5000 gal	1996	7.12	NA	S-10
E-11	Fixed-roof w/ N2 Pad, Methyl Ethyl Ketone	8000 gal	1996	7.12	NA	S-11
E-12	Fixed-roof w/ N2 Pad, Methanol	8000 gal	1996	7.12	NA	S-12
E-13	Fixed-roof w/ N2 Pad, Ethyl acetate	8000 gal	1996	7.12	NA	S-13
E-14	Fixed-roof w/ N2 Pad, Solvent 100	3000 gal	1996	7.12	NA	S-14
E-15	Fixed-roof w/ N2 Pad, Toluene	3000 gal	1996	7.12	NA	S-15
E-16	Fixed-roof w/ N2 Pad, Dowanol	3000 gal	1996	7.12	NA	S-16
E-17	Fixed-roof w/ N2 Pad, Ethanol	3000 gal	1996	7.12	NA	S-17
E-18	Fixed-roof w/ PV vent,	2500 gal	1998	7.12	NA	S-18

EP ID	Description	Maximum Capacity	Construction Date	Applicable Regulation	Control Device	Stack ID
	Xylene					
E-23	Fixed-roof w/ PV vent, Mineral Spirits	2000 gal	1998	7.12	NA	S-23
E-24	Fixed-roof w/ PV vent, Dowanol	2000 gal	1998	7.12	NA	S-24

U1 Controls

There are no control devices associated with Emission Unit U1.

U1 Specific Conditions**S1. Standards** (Regulation 2.17, section 5.1)**a. VOC**

- i. The owner or operator shall not allow *plant-wide* VOC emissions to exceed 25 tons per consecutive 12-month period.¹
- ii. The owner or operator shall equip each storage tank with a permanent submerged fill pipe if the true vapor pressure of the material stored is equal to or greater than 1.5 psia. The true vapor pressure “as stored” shall be determined on an instantaneous basis under conditions representing worst-case conditions. (Regulation 7.12, section 3.3)

b. HAP

- i. The owner or operator shall not allow *plant-wide* single HAP emissions to exceed 5 tons per consecutive 12-month period for each HAP.¹
- ii. The owner or operator shall not allow *plant-wide* total HAP emissions to exceed 12.5 tons per consecutive 12-month period.¹

c. District Regulation 5.15 Regulated Substance (40 CFR Part 68, Subpart G)

If any toxic substances listed in Tables 1 through 4 to 40 CFR 68.130 are present at the stationary source in an amount greater than the threshold quantity specified in Regulation 5.15, the owner or operator shall comply with the requirements specified in Regulation 5.15, including the requirement to submit a Risk Management Plan in a method and format as specified by the District and EPA. (See Off-Permit Documents Section of this permit)

S2. Monitoring and Record Keeping (Regulation 2.17, section 5.2)

The owner or operator shall maintain the required records for a minimum of 5 years and make the records readily available to the District upon request.

a. VOC

- i. The owner or operator shall monthly monitor and maintain records of monthly throughput of each product stored and the consecutive 12-month throughput of each product stored.
- ii. The owner or operator shall maintain records, including calculations, of the *plant-wide* consecutive 12-month VOC emissions, for each month in the reporting period.

¹ On 03/10/14, the source requested to be exempt from the requirements of STAR by accepting the following limits: 25 tons per year of a regulated air pollutant, 5 tons per year of a single HAP, and 12.5 tons per year of combined HAPs.

b. HAP

- i. The owner or operator shall maintain a copy of the Material Safety Data Sheet (MSDS) or Safety Data Sheets (SDS) for each HAP-containing material.
- ii. The owner or operator shall monthly monitor and maintain records of the monthly throughput of each HAP-containing raw material, the HAP content, and the consecutive 12-month throughput of each HAP-containing raw material.
- iii. The owner or operator shall maintain records, including calculations, of the *plant-wide* consecutive 12-month emissions of each single HAP and total HAP for each month in the reporting period.

c. 112(r) Regulated Substances (Regulation 5.15)

If any toxic substances listed in Tables 1 through 4 to 40 CFR 68.130 are present at the stationary source in an amount greater than the threshold quantity specified in Regulation 5.15, the owner or operator shall monitor the processes and keep records required by Regulation 5.15.

S3. Reporting (Regulation 2.17, section 5.2)

The owner or operator shall submit annual compliance reports in accordance with General Condition 12.

a. VOC

The owner or operator shall report the *plant-wide* consecutive 12-month VOC emissions for each month in the reporting period.

b. HAP

- i. The owner or operator shall report the *plant-wide* consecutive 12-month emissions of each single HAP for each month in the reporting period.
- ii. The owner or operator shall report the *plant-wide* consecutive 12-month emissions of total HAP for each month in the reporting period.

b. 112(r) Regulated Substances (Regulation 5.15)

If any toxic substances listed in Tables 1 through 4 to 40 CFR 68.130 are present at the stationary source in an amount greater than the threshold quantity specified in Regulation 5.15, the owner or operator shall comply with the reporting requirements specified in Regulation 5.15, including the requirement to submit a Risk Management Plan in a method and format as specified by the District and EPA.

U1 Comment

1. The emission points were previously permitted under the following attachments.

EP ID	Attachment
Seventeen (17) above ground storage tanks	148-94
Two (2) 2,000 gallon storage tanks.	81-98

Emission Unit U2**U2:** Solvent packaging**U2 Applicable Regulations**

Federally Enforceable Regulations		
Regulation	Title	Applicable Sections
5.15	Chemical Accident Prevention Provisions	1
7.25	Standard of Performance for New Sources Using Volatile Organic Compounds	1, 2, 3, 4 and 5

U2 Emission Points

EP ID	Description	Maximum Capacity	Construction Date	Applicable Regulation	Control Device	Stack ID
E-25	Packaging of solvents into portable containers	2000 gph	1996	7.25	NA	S-25

U2 Controls

There are no control devices associated with Emission Unit U2.

U2 Specific Conditions**S1. Standards** (Regulation 2.17, section 5.1)**a. VOC**

- i. The owner or operator shall not allow *plant-wide* VOC emissions to equal or exceed 25 tons per consecutive 12-month period.²
- ii. For EP E-25, subject to Regulation 7.25, the owner or operator shall not allow or cause the total VOC emissions to exceed 5 tons during any consecutive 12-month period. (Regulation 7.25, section 3)

b. HAP

- i. The owner or operator shall not allow *plant-wide* single HAP emissions to equal or exceed 5 tons per consecutive 12-month period for each HAP.³
- ii. The owner or operator shall not allow *plant-wide* total HAP emissions to equal or exceed 12.5 tons per consecutive 12-month period.³

c. District Regulation 5.15 Regulated Substance (40 CFR Part 68, Subpart G)

If any toxic substances listed in Tables 1 through 4 to 40 CFR 68.130 are present at the stationary source in an amount greater than the threshold quantity specified in Regulation 5.15, the owner or operator shall comply with the requirements specified in Regulation 5.15, including the requirement to submit a Risk Management Plan in a method and format as specified by the District and EPA. (See Off-Permit Documents Section of this permit)

S2. Monitoring and Record Keeping (Regulation 2.17, section 5.2)

The owner or operator shall maintain the required records for a minimum of 5 years and make the records readily available to the District upon request.

a. VOC

- i. The owner or operator shall monthly monitor and maintain records of the throughput of each product processed during each calendar month and consecutive 12-month period.
- ii. The owner or operator shall maintain records, including calculations, of the consecutive 12-month VOC emissions from EP E-25, for each month in the reporting period.
- iii. The owner or operator shall maintain records, including calculations, of the *plant-wide* consecutive 12-month VOC emissions, for each month in the reporting period.

² On 03/10/14, the source requested to be exempt from the requirements of STAR by accepting the following limits: 25 tons per year of a regulated air pollutant, 5 tons per year of a single HAP, and 12.5 tons per year of combined HAPs.

b. HAP

- i. The owner or operator shall maintain a copy of the Material Safety Data Sheet (MSDS) or Safety Data Sheet (SDS) for each HAP-containing material.
- ii. The owner or operator shall monthly monitor and maintain records of the monthly throughput of each HAP-containing raw material, the HAP content, and the consecutive 12-month throughput of each HAP-containing raw material.
- iii. The owner or operator shall maintain records, including calculations, of the *plant-wide* consecutive 12-month emissions of each single HAP and total HAP for each month in the reporting period.

c. 112(r) Regulated Substances (Regulation 5.15)

If any toxic substances listed in Tables 1 through 4 to 40 CFR 68.130 are present at the stationary source in an amount greater than the threshold quantity specified in Regulation 5.15, the owner or operator shall monitor the processes and keep records required by Regulation 5.15.

S3. Reporting (Regulation 2.17, section 5.2)

The owner or operator shall submit annual compliance reports in accordance with General Condition 12.

a. VOC

- i. The owner or operator shall report the *plant-wide* consecutive 12-month VOC emissions for each month in the reporting period.
- ii. The owner or operator shall report the consecutive 12-month VOC emissions from EP E-25 for each month in the reporting period.

b. HAP

- iii. The owner or operator shall report the *plant-wide* consecutive 12-month emissions of each single HAP for each month in the reporting period.
- iv. The owner or operator shall report the *plant-wide* consecutive 12-month emissions of total HAP for each month in the reporting period.

b. 112(r) Regulated Substances (Regulation 5.15)

If any toxic substances listed in Tables 1 through 4 to 40 CFR 68.130 are present at the stationary source in an amount greater than the threshold quantity specified in Regulation 5.15, the owner or operator shall comply with the reporting requirements specified in Regulation 5.15, including the requirement to submit a Risk Management Plan in a method and format as specified by the District and EPA.

U2 Comment

1. The emission points were previously permitted under the following attachments.

EP ID	Attachment
Container packaging of solvents	149-94

Emission Unit U3**U3:** Bulk tanker loading**U3 Applicable Regulations**

Federally Enforceable Regulations		
Regulation	Title	Applicable Sections
5.15	Chemical Accident Prevention Provisions	1
7.22	Standard of Performance for New Volatile Organic Materials Loading Facilities	1, 2 and 3

U3 Emission Points

EP ID	Description	Maximum Capacity	Construction Date	Applicable Regulation	Control Device	Stack ID
E-26	Bulk tanker loading	6000 gph	1996	7.22	NA	S-26

U3 Controls

There are no control devices associated with Emission Unit U3.

U3 Specific Conditions**S1. Standards** (Regulation 2.17, section 5.1)**a. VOC**

- i. The owner or operator shall not allow *plant-wide* VOC emissions to equal or exceed 25 tons per consecutive 12-month period.³
- ii. The owner or operator shall not load any volatile organic materials into any tank, truck, trailer, or railroad car from any loading facility unless such loading is accomplished by submerged fill, bottom loading, or equivalent methods approved by the District. Pneumatic, hydraulic, or other mechanical means shall be provided to prevent liquid organic compounds drainage from the loading device when it is removed from the hatch, or to accomplish complete drainage before such removal. (Regulation 7.22, Section 3.1)
- iii. The owner or operator shall not load 20,000 gallons or more of volatile organic materials in any one day. (Regulation 7.22, Section 3.1)

b. HAP

- i. The owner or operator shall not allow *plant-wide* single HAP emissions to equal or exceed 5 tons per consecutive 12-month period for each HAP.⁵
- ii. The owner or operator shall not allow *plant-wide* total HAP emissions to equal or exceed 12.5 tons per consecutive 12-month period.⁵

c. District Regulation 5.15 Regulated Substance (40 CFR Part 68, Subpart G)

If any toxic substances listed in Tables 1 through 4 to 40 CFR 68.130 are present at the stationary source in an amount greater than the threshold quantity specified in Regulation 5.15, the owner or operator shall comply with the requirements specified in Regulation 5.15, including the requirement to submit a Risk Management Plan in a method and format as specified by the District and EPA. (See Off-Permit Documents Section of this permit)

S2. Monitoring and Record Keeping (Regulation 2.17, section 5.2)

The owner or operator shall maintain the required records for a minimum of 5 years and make the records readily available to the District upon request.

a. VOC

- i. The owner or operator shall monthly monitor and maintain records of monthly throughput of each product processed through the loading rack and the consecutive 12-month throughput of each product stored.

³ On 03/10/14, the source requested to be exempt from the requirements of STAR by accepting the following limits: 25 tons per year of a regulated air pollutant, 5 tons per year of a single HAP, and 12.5 tons per year of combined HAPs.

- ii. The owner or operator shall maintain records, including calculations, of the *plant-wide* consecutive 12-month VOC emissions, for each month in the reporting period.

b. **HAP**

- i. The owner or operator shall maintain a copy of the Material Safety Data Sheet (MSDS) or Safety Data Sheet (SDS) for each HAP-containing material.
- ii. The owner or operator shall monthly monitor and maintain records of the monthly throughput of each HAP-containing raw material, the HAP content, and the consecutive 12-month throughput of each HAP-containing raw material.
- iii. The owner or operator shall maintain records, including calculations, of the *plant-wide* consecutive 12-month emissions of each single HAP and total HAP for each month in the reporting period.

c. **112(r) Regulated Substances (Regulation 5.15)**

If any toxic substances listed in Tables 1 through 4 to 40 CFR 68.130 are present at the stationary source in an amount greater than the threshold quantity specified in Regulation 5.15, the owner or operator shall monitor the processes and keep records required by Regulation 5.15.

S3. **Reporting** (Regulation 2.17, section 5.2)

The owner or operator shall submit annual compliance reports in accordance with General Condition 12.

a. **VOC**

The owner or operator shall report the *plant-wide* consecutive 12-month VOC emissions for each month in the reporting period.

b. **HAP**

- i. The owner or operator shall report the *plant-wide* consecutive 12-month emissions of each single HAP for each month in the reporting period.
- ii. The owner or operator shall report the *plant-wide* consecutive 12-month emissions of total HAP for each month in the reporting period.

c. **112(r) Regulated Substances (Regulation 5.15)**

If any toxic substances listed in Tables 1 through 4 to 40 CFR 68.130 are present at the stationary source in an amount greater than the threshold quantity specified in Regulation 5.15, the owner or operator shall comply with the reporting requirements specified in Regulation 5.15, including the requirement to submit a Risk Management Plan in a method and format as specified by the District and EPA.

U3 Comment

1. The emission points were previously permitted under the following attachments.

EP ID	Attachment
Truck loading rack. Bulk loading of solvents into tanker trucks, trailers, and rail cars	23-97

Off-Permit Documents

Risk Management Plan, November 01, 2010

Insignificant Activities

Description	Quantity	Basis
Combustion sources < 1.0 MMBtu/hr	1	Regulation 1.02 Appendix A section 1.1.
Internal combustion engines, whether fixed or mobile (forklifts)	9	Regulation 1.02 Appendix A section 2.

Note:

- 1) Insignificant Activities identified in District Regulation 1.02 Appendix A may be subject to size or production rate disclosure requirements.
- 2) Insignificant Activities identified in District Regulation 1.02 Appendix A shall comply with generally applicable requirements.
- 3) Activities identified in Regulation 1.02, Appendix A, may not require a permit and may be insignificant with regard to application disclosure requirements but may still have generally applicable requirements that continue to apply to the source and must be included in the permit.
- 4) Emissions from Insignificant Activities shall be reported in conjunction with the reporting of annual emissions of the facility as required by the District.
- 5) In lieu of recording annual throughputs and calculating actual annual emissions, the owner or operator may elect to report the pollutant Potential To Emit (PTE) quantity listed in the Insignificant Activities table, as the annual emission for each piece of equipment.
- 6) The owner or operator shall annually submit an updated list of insignificant activities, including an identification of the additions and removals of insignificant activities that occurred during the preceding year, with the compliance certification due April 15th.